REMARKS/ARGUMENTS

In the Office Action mailed December 11, 2007 (hereinafter, "Office Action"), claims 1, 5, 11, 14, 15, 22, 23 and 24 stand rejected under 35 U.S.C. § 112. Claims 1-28 stand rejected under 35 U.S.C. § 103. Claims 1, 11, 14-17, 20, 22-25 and 28 have been amended.

Applicant respectfully responds to the Office Action.

I.   **Claims 1, 5, 11, 14, 15, 22, 23 and 24 Rejected Under 35 U.S.C. § 112**

Claims 1, 5, 11, 14, 15, 22, 23 and 24 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant respectfully responds to this rejection.

Claims 1, 14 and 22 have been amended to address the Office Action's rejection. Specifically, the claims have been amended to provide sufficient antecedent basis for the claim subject matter "wherein the rendering is initiated at the printing device." Various aspects of rendering are found in Applicant's specification in at least paragraphs [07], [19], [51], [59], [66], [70], [71] and [75]. Accordingly, Applicant respectfully requests that the rejection of claims 1, 14 and 22 be withdrawn as these claims particularly point out and distinctively claim the subject matter which Applicant regards as the invention.

Claim 5 recites "further comprising determining which of the plurality of print options are standard print options on the computing device and which of the plurality of print options are proprietary to the printing device." Applicant submits that it is clear from both the wording of claim 5 and the support found in paragraph [26] of Applicant's specification that "[t]he print options comprise standard print options that are standard on the computing device and proprietary print options that are proprietary to the printing device." (Specification, para. [26]). Because Applicant can find nothing unclear in the wording of this claim, Applicant respectfully requests that the rejection of claim 5 be withdrawn.

Claim 11 as amended recites "invoking an application on the computing device that is associated with a document format to background print the document using a generic printer driver,

wherein the document format is a native document format." Support for this amendment may be found in Applicant's specification in at least paragraph [25]. Applicant respectfully requests that the rejection to claim 11 be withdrawn.

Claim 15 as amended recites "causing an application to be started on the computing device that is associated with a document format to background print the document using a generic printer driver, wherein the document format is a native document format." Support for this amendment may be found in Applicant's specification in at least paragraph [25]. Applicant respectfully requests that the rejection to claim 15 be withdrawn.

Claim 23 as amended recites "causing an application to be started on the computing device that is associated with a document format to background print the document using a generic printer driver, wherein the document format is a native document format." Support for this amendment may be found in Applicant's specification in at least paragraph [25]. Applicant respectfully requests that the rejection to claim 23 be withdrawn.

Claim 14 as amended recites "receive the rendered document after it has been rendered by the computing device, wherein the rendered document comprises printer ready data." Support for this amendment may be found in Applicant's specification in at least paragraph [26]. Applicant respectfully requests that the rejection to claim 14 be withdrawn as the subject matter in this claim is not unclear.

Claim 14 has been amended to address the § 112, second paragraph rejection. Support for this amendment may be found in Applicant's specification in at least paragraph [26]. Applicant respectfully requests that the rejection to claim 14 be withdrawn.

Claim 22 has been amended to address the § 112, second paragraph rejection. Support for this amendment may be found in Applicant's specification in at least paragraph [26]. Applicant respectfully requests that the rejection to claim 22 be withdrawn.

Claim 24 as amended recites "recognizing the rendered document at the printing device through use of an identification." Support for this amendment may be found in Applicant's

specification in at least paragraph [21]. Applicant respectfully requests that the rejection to claim 24 be withdrawn.

II.   Claims 1-28 Rejected Under 35 U.S.C. § 103(a)

Claims 1-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2004/0100651 to Leone, III et al. (hereinafter, "Leone") in view of U.S. Patent Application Publication No. 2003/0048470 to Garcia (hereinafter, "Garcia"). This rejection is respectfully traversed.

The factual inquiries that are relevant in the determination of obviousness are determining the scope and contents of the prior art, ascertaining the differences between the prior art and the claims in issue, resolving the level of ordinary skill in the art, and evaluating evidence of secondary consideration. KSR Int'l Co. v. Teleflex Inc., 550 U.S. ___, 2007 U.S. LEXIS 4745, at **4-5 (2007) (citing Graham v. John Deere Co. of Kansas City, 383 U.S. 1, 17-18 (1966)). To establish a *prima facie* case of obviousness, the prior art references "must teach or suggest all the claim limitations." M.P.E.P. § 2142. Moreover, the analysis in support of an obviousness rejection "should be made explicit." KSR, 2007 U.S. LEXIS 4745, at **37. "[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness." Id. (citing In re Kahn, 441 F.3d 977, 988 (Fed. Cir. 2006)).

Applicant respectfully submits that the claims at issue are patentably distinct from the cited references. The cited references do not teach or suggest all of the limitations in these claims.

Claim 1 as amended recites "sending a message to the computing device from the printing device to print the document with at least one print option." Support for this amendment may be found in Applicant's specification in at least paragraph [70]. Leone, alone or in combination with Garcia, does not teach or suggest this subject matter.

Instead Leone states:

For printing, document processing application 46, upon receiving a print specification command from browser 44 on client platform 36, forwards the document data to a print rendering server 50. Print rendering server 50, which may comprise a dedicated hardware and/or software component, provides print output in a format suitable for the target destination printer that is identified in the print specification command. HTTP server 48 performs the transfer of the print-ready data stream from print rendering server 50 to client platform 36, across network link 20.

Upon receipt of the print-ready data at client platform 36, print proxy applet 38 accepts the data and transfers the data to remote printer 22 or "local" printer 24. It should be appreciated that "local" printer 24 can either be directly connected to client 36 using a cable, RF link, IR link or the like or be network connected to client 36 via a local area network.

Leone, paragraphs [0030] – [0031].

The above cited portion of Leone describes how a "document processing application 46, upon receiving a print specification command from browser 44 on client platform 36, forwards the document data to a print rendering server 50. Print rendering server 50, which may comprise a dedicated hardware and/or software component, provides print output in a format suitable for the target destination printer that is identified in the print specification command." The above cited portion of Leone thus describes how a "print specification command from browser 44 on client platform 36" is sent to the print rendering server to print a document. Leone further states that the "print proxy applet 38 accepts the data and transfers the data to remote printer 22 or 'local' printer 24."

In Figure 3 of Leone, the client platform 36 and the browser 44 on the client platform 36 are distinct entities separate from the remote printer 22 or the "local" printer 24. The "print specification command" is sent from the client platform and not from the printer. Thus, Leone does not teach or suggest "sending a message to the computing device from the printing device to print the document with at least one print option." The addition of Garcia does not overcome the deficiencies of Leone.

Instead, Garcia states:

Web browser 23 comprises an Internet browser such as Internet Explorer® or Netscape Navigator®, or other system for generating visual

> objects such as text, objects, and graphical user interface objects, that can be activated and deactivated with pointing device 26. Web browser 23 preferably further comprises web browser software supported by any one of several computer system platforms such as Windows, Macintosh, Unix, Linux, and other platforms capable of executing web browser software that provides HTTP (Hyper Text Transfer Protocol) client functions and that renders HTML (Hyper Text Markup Language) files.
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> With Web browser 23 and access to the Internet, printer 12 can access content from web pages of the World Wide Web independent from a computer workstation. Instead, a user at printer 12 can request printing of content from web pages on the World Wide Web via web browser 23. This feature puts the control of printing documents at the printer itself rather than at a computer workstation, which may be located remotely from printer 12.

Garcia, paragraphs [0016]-[0017].

Garcia describes a printer having a "[w]eb browser 23 and access to the Internet" such that "a user at printer 12 can request printing of content from web pages on the World Wide Web via web browser 23." However, the above cited portion of Garcia does not teach or suggest "sending a message to the computing device from the printing device to print the document with at least one print option." The printer described in Garcia does not send a message to the computing device to print a document as suggested by the Office Action. Instead, the web browser on the printer "renders HTML (Hyper Text Markup Language) files." This allows for a "system for generating visual objects such as text, objects, and graphical user interface objects." The printer in Garcia thus prints an HTML file without sending a message to a computing device requesting the printing of the HTML file. Furthermore, the printer in Garcia is only capable of printing HTML files processed by the web browser.

Claim 1 as amended further recites "rendering the document at the computing device into printer ready data using the at least one print option thereby providing a rendered document, wherein the rendering is initiated at the printing device." Support for this amendment may be found in Applicant's specification in at least paragraphs [27] and [68]. Leone, alone or in combination with Garcia, does not teach or suggest this subject matter.

Instead Leone states:

> For printing, document processing application 46, upon receiving a print specification command from browser 44 on client platform 36, forwards the document data to a print rendering server 50. Print rendering server 50, which may comprise a dedicated hardware and/or software component, provides print output in a format suitable for the target destination printer that is identified in the print specification command. HTTP server 48 performs the transfer of the print-ready data stream from print rendering server 50 to client platform 36, across network link 20.
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> Upon receipt of the print-ready data at client platform 36, print proxy applet 38 accepts the data and transfers the data to remote printer 22 or "local" printer 24. It should be appreciated that "local" printer 24 can either be directly connected to client 36 using a cable, RF link, IR link or the like or be network connected to client 36 via a local area network.

Leone, paragraphs [0030]-[0031].

The above cited portion of Leone describes the use of a "[p]rint rendering server" that "provides print output in a format suitable for the target destination printer that is identified in the print specification command." This rendering occurs when the "document processing application 46, upon receiving a print specification command from browser 44 on client platform 36, forwards the document data to a print rendering server." The above cited portion of Leone thus describes a "print specification command from browser 44 on client platform 36" that initiates the rendering of a document. Leone further states that the "print proxy applet 38 accepts the data and transfers the data to remote printer 22 or "local" printer 24." In Figure 3 of Leone, the browser 44 on the client platform 36 is separate from the remote printer 22 or the "local" printer 24. The rendering of a document in Leone is therefore not initiated by either the remote printer or the local printer. Thus, the above cited portion of Leone does not teach or suggest "rendering the document at the computing device into printer ready data using the at least one print option thereby providing a rendered document, wherein the rendering is initiated at the printing device." The addition of Garcia does not overcome the deficiencies of Leone.

Instead, Garcia states:

> Web browser 23 comprises an Internet browser such as Internet Explorer® or Netscape Navigator®, or other system for generating visual

> objects such as text, objects, and graphical user interface objects, that can be activated and deactivated with pointing device 26. Web browser 23 preferably further comprises web browser software supported by any one of several computer system platforms such as Windows, Macintosh, Unix, Linux, and other platforms capable of executing web browser software that provides HTTP (Hyper Text Transfer Protocol) client functions and that renders HTML (Hyper Text Markup Language) files.
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> With Web browser 23 and access to the Internet, printer 12 can access content from web pages of the World Wide Web independent from a computer workstation. Instead, a user at printer 12 can request printing of content from web pages on the World Wide Web via web browser 23. This feature puts the control of printing documents at the printer itself rather than at a computer workstation, which may be located remotely from printer 12.

Garcia, paragraphs [0016]-[0017].

Garcia describes how "a user at printer 12 can request printing of content from web pages on the World Wide Web via web browser 23." The web browser "comprises web browser software… that provides HTTP (Hyper Text Transfer Protocol) client functions and that renders HTML (Hyper Text Markup Language) files." Garcia describes the rendering of HTML files by the web browser software as part of the web browser which is part of the printer, not "rendering the document at the computing device into printer ready data using the at least one print option thereby providing a rendered document, wherein the rendering is initiated at the printing device."

In view of the foregoing, Applicant respectfully submits that claim 1 is patentably distinct from the cited references. Accordingly, Applicant respectfully requests that the rejection of claim 1 be withdrawn because Leone, alone or in combination with Garcia, does not teach or suggest all of the subject matter of claim 1.

Claims 2-13 depend either directly or indirectly from claim 1. Accordingly, Applicant respectfully requests that the rejection of claims 2-13 be withdrawn for the reasons set forth above.

Claim 14 as amended recites "send a message to the computing device from the printing device to print the document with the standard print options." Support for this amendment may be found in Applicant's specification in at least paragraph [70]. Leone, alone or in combination with Garcia, does not teach or suggest this subject matter.

Instead Leone states:

> For printing, document processing application 46, upon receiving a print specification command from browser 44 on client platform 36, forwards the document data to a print rendering server 50. Print rendering server 50, which may comprise a dedicated hardware and/or software component, provides print output in a format suitable for the target destination printer that is identified in the print specification command. HTTP server 48 performs the transfer of the print-ready data stream from print rendering server 50 to client platform 36, across network link 20.
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In Figure 3 of Leone, the client platform 36 and the browser 44 on the client platform 36 are distinct entities separate from the remote printer 22 or the "local" printer 24. The "print specification command" is sent from the client platform and not from the printer. Thus, Leone does not teach or suggest "send a message to the computing device from the printing device to print the document with the standard print options." The addition of Garcia does not overcome the deficiencies of Leone.

Instead, Garcia states:

> Web browser 23 comprises an Internet browser such as Internet Explorer® or Netscape Navigator®, or other system for generating visual objects such as text, objects, and graphical user interface objects, that can be activated and deactivated with pointing device 26. Web browser 23 preferably further comprises web browser software supported by any one of several computer system platforms such as Windows, Macintosh, Unix, Linux, and other platforms capable of executing web browser software that provides HTTP (Hyper Text Transfer Protocol) client functions and that renders HTML (Hyper Text Markup Language) files.
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Claim 14 as amended further recites "wherein rendering is initiated at the printing device." Support for this amendment may be found in Applicant's specification in at least paragraphs [27] and [68]. Leone, alone or in combination with Garcia, does not teach or suggest this subject matter.

Instead Leone states:

For printing, document processing application 46, upon receiving a print specification command from browser 44 on client platform 36, forwards the document data to a print rendering server 50. Print rendering server 50, which may comprise a dedicated hardware and/or software component, provides print output in a format suitable for the target destination printer that is identified in the print specification command. HTTP server 48 performs the transfer of the print-ready data stream from print rendering server 50 to client platform 36, across network link 20.

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In view of the foregoing, Applicant respectfully submits that claim 14 is patentably distinct from the cited references. Accordingly, Applicant respectfully requests that the rejection of claim 14 be withdrawn because Leone, alone or in combination with Garcia, does not teach or suggest all of the subject matter of claim 14.

Claims 15-21 depend either directly or indirectly from claim 14. Accordingly, Applicant respectfully requests that the rejection of claims 15-21 be withdrawn for the reasons set forth above.

Claim 22 as amended includes subject matter similar to the subject matter of claim 14. As such, Applicant respectfully requests that the rejection of claim 22 be withdrawn because Leone, alone or in combination with Garcia, does not teach or suggest all of the subject matter of claim 22.
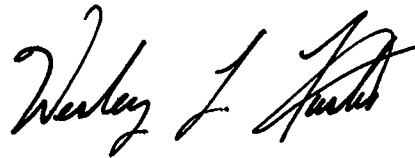
Claims 23-28 depend directly from claim 22. Accordingly, Applicant respectfully requests that the rejection of claims 23-28 be withdrawn for the reasons set forth above.

III.   Conclusion

Applicant respectfully asserts that all pending claims are patentably distinct from the cited references, and request that a timely Notice of Allowance be issued in this case. If there are any remaining issues preventing allowance of the pending claims that may be clarified by telephone, the Examiner is requested to call the undersigned.

Respectfully submitted,

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